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“Para tener éxito no tienes que hacer cosas extraordinarias, tienes que hacer cosas ordinarias extraordinariamente bien”.

From: hcobo@hcounsel.com [<mailto:hcobo@hcounsel.com>]

Sent: Thursday, October 04, 2018 1:07 PM

To: Hermann Bauer; Ubaldo M. Fernández Barrera; dperez@omm.com

Subject: RE: Lift of Stay Notice / Request to Meet and Confer / Case No. 17-03283 (3:16-cv-02516)

Importance: High

Debtors' Counsel,

By way of this communication, we express our client **Antonio Cosme-Calderon**, intent to file a Stay Relief Motion to seek relief from the automatic stay to continue ordinary course of his employment discrimination civil action before the Federal District Court for the District of Puerto Rico (Civil Case No. **3:16-cv-2516**)

Movant: **Antonio Cosme-Calderon**

Movant's contact information: **Calle Angel Rivero #525, Urb. Ciudad Central II, Carolina, PR 00987**

Claim/Lawsuit/Proceeding: **RETALIATION**

Case Number: **3:16-cv-2516**

Court: **THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO**

Amount claimed and asserted causes of action: **Removal of disciplinary actions, back pay, all loss benefits, front pay and other equitable relief. Compensatory and general damages in the amount of \$1,000,000.00**

Status of claims/lawsuit/proceeding: **Defendant's Dispositive Motion (Rule 12) was denied. (Pre-Discovery)**

Cause as to why the stay should be lifted: **Redress of Plaintiff's discrimination and hostile work environment claims does not require Bankruptcy law, and Bankruptcy Court is no proper venue for employment retaliation claims. A copy of the District Court's Order is attached, for your reference.**

Kindly contact the undersigned counsel for movant, to conduct a telephone or in person meet and confer, to attempt to resolve movant's request from relief of the automatic stay. We appreciate your response, on or before Friday, October 19, 2018.

Regards,

Humberto Cobo-Estrella, Esq.

Attorney at Law

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